

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA**

In re:

Bamberg County Memorial Hospital,

Debtor.

Case No. 11-3877
Chapter 9

**RESPONSE OF DEBTOR TO § 362 MOTION OF BAMBERG HEALTHCARE
PROPERTIES, INC. UNIHEALTH POST-ACUTE CARE OF BAMBERG, LLC, AND
UNITED PHARMACY SERVICES, INC. D/B/A UNITED PHARMACY SERVICES OF
LEXINGTON (Document No. 47)**

Debtor responds to the Motion for Stay Relief [Document no. 47] as follows:

1. Debtor admits paragraphs 1, 5 and 6 of the Motion.
2. Debtor lacks sufficient information to admit or deny paragraphs 2, 3 and 4 of the Motion and therefore denies same.
3. Debtor admits that it is not a party to or contractually obligated to Movants under the contracts referenced in the Motion. However, Debtor has made payments to Movants for good or services rendered pursuant to one or more of the contracts.
4. Debtor does not contend that the automatic stay is applicable to the extent Movants seek to enforce the contracts against a party other than the Debtor or its officers.
5. Debtor reserves any and all rights it might have against the Movants for claims, known or unknown, relating to or arising from the contracts which form the basis for the relief sought by the Motion.

Accordingly, Debtor requests that the court inquire into this matter and enter such order as is appropriate.

HAYNSWORTH SINKLER BOYD, P.A.

By: /s/ Stanley H. McGuffin

Stanley H. McGuffin

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Attorneys for Bamberg County Memorial
Hospital

July 15, 2011

**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA**

In re:

Bamberg County Memorial Hospital

Debtor.

Case No. 11-03877

Chapter 9

CERTIFICATE OF SERVICE

I, the undersigned employee of Haynsworth Sinkler Boyd, P.A., do hereby certify that I have caused the foregoing to be served via U.S. Mail or by other means indicated below on June 23, 2011, with return address clearly shown to said parties at the addresses shown below

1. **RESPONSE OF DEBTOR TO § 362 MOTION OF
BAMBERG HEALTHCARE PROPERTIES, INC.
UNIHEALTH POST-ACUTE CARE OF BAMBERG,
LLC, AND
UNITED PHARMACY SERVICES, INC. D/B/A
UNITED PHARMACY SERVICES OF LEXINGTON
(Document No. 47)**

Parties of Record

See Attached Service List

HAYNSWORTH SINKLER BOYD, P.A.

By: /s/ Tami G. Hatcher

Tami G. Hatcher

Paralegal to Stanley H. McGuffin

Date: July 15, 2011

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